

EXHIBIT 26

Supplemental Declaration of Karim Golding

1. I have reviewed the declarations Supervisory Deportation Officer Pitman submitted in this case.
2. As of April the 3rd, 2020 ICE detainees in Unit 10 were merged with detainees in Unit 9. There are now 99 detainees crammed into Unit 9. Some of us are in four man cells and while others are in two man cells. The entire unit was never quarantined in a single unit for 14 days with detainees in an individual cell. It is not physically possible to house 100 detainees in a unit whose capacity is 128 and for each detainee to have an individual cell.
3. There was no test issued when the two units merged. When detainees asked to get tested for the virus they were discouraged by the medical staffing team. We were not moved to any other “sterile” unit. Since the units merged, there have been at least more than three detainees that have been introduced into the community. This is quite contrary to the statement made by officer Pitman in paragraph 13 of his affidavit. We are in constant contact with staff and correction officers. Detainees are still being brought to and from medical.
4. There were at least four detainees that came into contact with other detainees who were in contact with multiple confirmed cases of COVID-19. These detainees were transferred from Baltimore after Howard detention center was closed down because of the pandemic. They came into contact with detainees from New York detention centers. These detainees were then moved to the LaSalle ICE center but were barred from entering the dormitory as other detainees rioted against their intake into the dorm. They were then brought to ECDC and have since been on the unit without any test or quarantine measures. This is in direct opposition to the statement made by Officer Pitman in paragraph 14.
5. Detainees have been told that there are no tests at ECDC, which is the reason why we were unable to get tested. Dr. Page, a doctor here, told us that they have screening, but no testing. On March 23, 2020, I went to the medical unit with a headache, shortness of breath, throat drip, and diarrhea. The medical staff told me that COVID-19 test was painful and unnecessary and just gave me tylenol and allergy medications.
6. Detainees have not been informed of any confirmed case in ECDC, medical personnel do not perform medical screenings in the form of daily vital sign checks of all the detainees in order to mitigate the spread of the virus in opposition. Officer’s Pitman’s statements in paragraph 18, section b are untrue.

7. In direct opposition to paragraph 20 of Officer Pitman's statement, ECDC does not provide industrial cleaner, frequent soap, paper towels or effective face masks. They issue only 1 mask designed to be used for only 8 hours. I have received 1 mask in 3 weeks.
8. In direct opposition to paragraph 20 of Officer Pitman's statement, our access to disinfectant is limited. Disinfectant is only issued once a week and we are advised by the staff to stretch it. The daily forced air machine only distributes disinfectant solutions for less than 2 minutes. We are not removed from our unit when the forced machine air is used. We are not given the extra supply of hand soap for the shower or the sink as described. They are limited even to the amount of toilet paper and bath soap needed. There are no disinfectant dispensers with the unit or paper towels. Everyday supplies are not routinely checked or available.
9. Given the ongoing COVID-19 crisis, I have authorized my attorney Jeremy Jong to sign for me. I can provide my original signature upon request.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. I understood and verified its contents in full.

Executed on May 5, 2020 in Etowah County Detention Center.

A handwritten signature in black ink, appearing to read "Jeremy Jong", is written over a horizontal line.

Jeremy Jong signing on behalf of Karim Golding